

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	Case No. 16-24443-JAD
	)	
Rodney M. Hickman	)	Chapter 13
Lynn M. Hickman	)	
Debtors	)	Related to Claim No. 6
	)	
Rodney M. Hickman	)	
Lynn M. Hickman	)	
Movants	)	
	)	
v.	)	
	)	
CitiMortgage, Inc. c/o Cenlar FSB and	)	
Ronda J. Winnecour, Trustee,	)	
Respondents	)	

**DECLARATION**

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtors, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to CitiMortgage, Inc. c/o Cenlar FSB Notice of Mortgage Payment Change dated November 5, 2021, the Debtor's current escrow payment for account number ending in **6409** is **\$467.55**. The new escrow payment is **\$485.05**. The new total mortgage payment is **\$1,054.61** effective January 1, 2021. The Debtors will make the escrow shortage of **\$17.50** in addition to their regular monthly Chapter 13 plan payment.

Dated: **November 5, 2021**

Respectfully submitted by:  
**/s/ Rodney M. Hickman**  
Rodney M. Hickman

Dated: **November 5, 2021**

Respectfully submitted by:  
**/s/ Lynn M. Hickman**  
Lynn M. Hickman

Dated: **November 5, 2021**

Respectfully submitted by:  
**/s/ Albert G. Reese, Jr., Esquire**  
Albert G. Reese, Jr., Esquire  
Attorney for Debtors  
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